

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Root Inc., *et al.*,

Plaintiffs,

v.

Brinson Caleb Silver, et al.,

Defendants.

:
:
:
:
:
:
:
:
:
:
:

Case No. 2:23-cv-512

Judge Sarah D. Morrison

Magistrate Judge Chelsey M. Vascura

**NOTICE OF SUBMISSION OF EVIDENCE IN SUPPORT OF REQUEST FOR
ATTORNEYS' FEES**

In accordance with the Court's Omnibus Order Granting Plaintiffs' Motion for Contempt (ECF No. 86), Plaintiffs submit the Declaration of Trial Counsel, William D. Kloss, Jr., and its attachments as Exhibit A. The attachments include redacted bills for time related to the preparation and prosecution of the Motion for Contempt. Plaintiffs should be awarded \$36,190.00 in fees.

Respectfully submitted,

/s/ William D. Kloss, Jr

William D. Kloss, Jr. (0040854), Trial Attorney
Elizabeth S. Alexander (0096401)
Grace E. Saalman (0101603)
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street, P.O. Box 1008
Columbus, Ohio 43216-1008
Phone (614) 464-6360
Fax (614) 719-4807
wdklossjr@vorys.com
esalexander@vorys.com
gesaalman@vorys.com

Matthew L. Kutcher (IL Bar No. 6275320)
Cooley LLP *Admitted Pro Hac Vice*
110 N. Wacker Drive Suite 4200
Chicago, IL 60606
Phone (312) 881-6500
Fax (312) 881 6598
mkutcher@cooley.com

Kristine A. Forderer (CA Bar No. 278754)
Cooley LLP *Admitted Pro Hac Vice*
3 Embarcadero Center
San Francisco, CA 94111
Phone (415) 693-2128
kforderer@cooley.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed electronically on this 11th day of May 2023 with the Clerk of Court using the CM/ECF system. Service will be made through the Court's CM/ECF system on all parties and attorneys so registered, and all parties may access this filing through the Court's system.

A copy was also sent by email to the following:

Paige McDaniel
5576 Alexanders Lake Road
Stockbridge, GA 30281

/s/ William D. Kloss, Jr.
William D. Kloss, Jr. (0040854)